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## *Kansas Corporation Commission*

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*Bill Graves, Governor   John Wine, Chair   Cynthia L. Claus, Commissioner   Brian J. Moline, Commissioner*

October 2, 2001

Michael Powell, Chairman  
Kathleen Abernathy, Commissioner  
Kevin Martin, Commissioner  
Michael Copps, Commissioner  
Federal Communications Commission

**RE:** In the Matter of 2000 Biennial Regulatory Review-Comprehensive Review of the Accounting Requirements and ARMIS Reporting Requirements for Incumbent Local Exchange Carriers.      **CC Docket No. 00-199.**

The State Corporation Commission of the State of Kansas (KCC) supports the filing made by NARUC in this matter with regard to the modification of accounting and ARMIS reporting requirements. The KCC agrees that it is reasonable to examine existing accounts and remove those which are no longer useful. At the same time it is most prudent to add accounts to accommodate changes occurring as the industry moves to a competitive environment. The proposed additions are designed to keep pace with the changes in the industry and to make relevant information available both to the FCC and state commissions. The recommended changes are the types of reasonable changes that have historically been made to Part 32.

Because of the changing telecommunications markets, the KCC revised the LECs' Annual Report for the year 2000 to collect information on Universal Service, resold and Unbundled Network Elements' (UNE) revenues and access lines. Adding specific accounts to capture the related revenues and expenses will enhance and standardize this process for the industry and regulators. Continued cooperation and coordination between the FCC and state commissions in the rapidly changing environment is essential. The KCC urges you to adopt NARUC's recommendations.

Respectfully Submitted,

John Wine, chair

Cynthia L. Claus, commissioner

Brian J. Moline, commissioner

cc: Jordan Goldstein (Senior Legal Advisor, Office of Commissioner Copps)  
Matthew Brill (Common Carrier Legal Advisor, Office of Commissioner Abernathy)  
Sam Feder (Senior Legal Advisor, Office of Commissioner Kevin Martin)  
Kyle Dixon (Legal Advisor, Office of Chairman Powell)  
Mike Savir, Andrew Mulitz, Ernestine Creech (Accounting Safeguards Division)  
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